

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SHARI AHRENDSEN, BARRY CLEMENT,  
and LISA BUSH, on behalf of the World  
Travel, Inc. Employee Stock Ownership Plan,  
and on behalf of a class of all other persons  
similarly situated,

Plaintiffs,

v.

PRUDENT FIDUCIARY SERVICES, LLC, a  
California Limited Liability Company,  
MIGUEL PAREDES, JAMES A. WELLS,  
JAMES R. WELLS, AND RICHARD G.  
WELLS.

Defendants.

**Case No. 2:21-cv-02157-HB**

**DEFENDANTS PRUDENT FIDUCIARY SERVICES AND MIGUEL PAREDES’S  
MOTION TO DISMISS PLAINTIFFS’ FIRST AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendants Prudent Fiduciary Services, LLC, and Miguel Paredes (the “Paredes Defendants”), respectfully move to dismiss Plaintiffs’ First Amended Complaint, Dkt. No. 36 (“FAC”) in its entirety. In support of their motion, the Paredes Defendants submit the accompanying memorandum of law and all exhibits thereto.

Pursuant to Local Rule 7.1(f), and due to the breadth and complexity of the issues raised by the FAC and by this Motion, the Paredes Defendants respectfully request oral argument on this Motion.

Dated: September 23, 2021

Respectfully submitted,

**GROOM LAW GROUP, CHARTERED**

By: /s/ Lars C. Golumbic  
Lars C. Golumbic (*pro hac vice*)  
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*Attorneys for PFS Defendants*

**CERTIFICATE OF SERVICE**

I certify that, on September 23, 2021, I served the foregoing on all parties of record via ECF.

/s/ Lars C. Golumbic  
Lars. C. Golumbic